

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA, ET AL.,

Plaintiffs,

v.

AMERICAN AIRLINES GROUP INC. and  
JETBLUE AIRWAYS CORPORATION,

Defendants.

Civil Action No. 1:21-cv-11558-LTS

**MOTION FOR PRO HAC VICE ADMISSION OF KATHERINE L. DACEY**

Pursuant to Rule 83.5.3 of the Local Rules of United States District Court for the District of Massachusetts, the undersigned attorney, duly admitted to practice before this Court and whose appearance has been filed in this action on behalf of non-party United Airlines, Inc. (“United”) moves that attorney Katherine L. Dacey, Goodwin Procter LLP, 100 Northern Avenue, Boston, Massachusetts 02210, be admitted to practice *pro hac vice* before this Court to represent United as co-counsel in the above-captioned action.

In support of this Motion, the undersigned attorney states that as evidenced in the attached Certification (Exhibit A), Attorney Dacey is a member of the bar in good standing in every jurisdiction where she has been admitted to practice, is not the subject of disciplinary proceedings pending in any jurisdictions in which she is a member of the bar, has not previously had a *pro hac vice* admission to this Court (or other admission for a limited purpose) revoked for misconduct, and has read and agreed to comply with the Local Rules of the United States District Court for the District of Massachusetts.

Attorney Dacey mistakenly believed that she had sought and obtained admission to the bar of this Court shortly after she was admitted to the bar of the Supreme Judicial Court of Massachusetts on July 30, 2020. Accordingly, Attorney Dacey filed a Notice of Appearance in this action on September 19, 2022. (Doc. No. 185.) Attorney Dacey's admission status was discovered on May 4, 2023, and immediate corrective action was taken, including notification to the Clerk's office and preparation of her application for admission to the bar of this Court which was submitted on May 5, 2023. During all relevant time periods Attorney Dacey has met the requirements for admission to the bar of this Court.

Counsel for United has conferred with counsel of record regarding the relief requested in this motion and counsel does not oppose it.

WHEREFORE, counsel for United respectfully request that the Court grant the admission of attorney Katherine L. Dacey *pro hac vice* to the Bar of this court *nunc pro tunc* to September 19, 2022.

Dated: May 8, 2023

/s/ John J. Falvey, Jr.

John J. Falvey, Jr. (BBO No. 542674)

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*Counsel for non-party United Airlines, Inc.*

**LOCAL RULE 7.1(a)(2) CERTIFICATE and CERTIFICATE OF SERVICE**

I hereby certify that counsel for United conferred with counsel for the parties regarding the relief requested in the foregoing Motion for Pro Hac Vice Admission of Katherine L. Dacey and counsel does not oppose the requested relief.

I further certify that on May 8, 2023, I caused a true and correct copy of the foregoing to be served by CM/ECF to the parties registered to the Court's CM/ECF system.

/s/ John J. Falvey, Jr.